



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

June 17, 2020

CAMILLE JOHNSON, TREASURER
FAIR FIGHT
1270 CAROLINE STREET, SUITE D120-311
ATLANTA, GA 30307

Response Due Date
07/22/2020

IDENTIFICATION NUMBER: C00693515

REFERENCE: AMENDED YEAR-END REPORT (07/01/2019 - 12/31/2019),
RECEIVED 03/20/2020

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 item(s):

1. Your calculations for Line 8 appear to be incorrect. Cash on hand at the close of the current reporting period should always equal the closing calendar year to date cash on hand amount. Please provide the corrected total on the Summary Page. (52 U.S.C. §30104(b))
2. The totals listed on Lines 6(c), 11(a)(i), 11(a)(iii), 11(d), 19, and 20, Column B of the Summary and Detailed Summary Pages appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (52 U.S.C. §30104(b))
3. The beginning cash balance of this report does not equal the ending balance of your Amended Mid-Year Report (1/1/19 - 6/30/19), received 3/3/20. Please correct this discrepancy and amend all subsequent report(s) that may be affected by the correction. (52 U.S.C. §30104(b))
4. Schedule A supporting Line 11(a)(i) (see attached) discloses a receipt(s) from an organization(s) that is not registered with the Commission. 52 U.S.C. §30118

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(formerly 2 U.S.C. §441b) prohibits the receipt of funds from national banks, corporations, and labor organizations. However, Commission records indicate that your Committee maintains a Non-Contribution Account consistent with the stipulated judgment in Carey v. FEC.

If the amounts in question were deposited into your Committee's Non-Contribution Account, please amend your report to disclose the item on Schedule A supporting Line 17 of the Detailed Summary Page and disclose "Non-Contribution Account" in the description field or in memo text. For more information please reference the "Reporting Guidance for Political Committees that Maintain and Non-Contribution Account" at <https://www.fec.gov/updates/fec-statement-on-carey-v-fec/>

If you have received a prohibited contribution, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

Please inform the Commission of your corrective action promptly by providing the date and method of your remedy (refund or transfer to a non-federal account) for each contribution. The committee should retain for its records copies of refund checks and transfers to nonfederal account for the contributions in question. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

5. Schedule A (see attached) discloses a contribution(s) from an individual(s) who has a mailing address outside of the United States of America. Please be advised that 52 U.S.C. §30121(a) and 11 CFR §110.20 prohibit foreign nationals from making contributions in connection with any election for political office or in connection with any primary election, convention, or caucus held to select candidates for any political office.

If the apparently prohibited contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

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If your committee follows the safe harbor guidelines outlined under 11 CFR §110.20(a)(7) for all contributions received from a foreign address to ensure that the sources of these contributions are not foreign nationals, please provide a detailed description of your procedures. These procedures must be used in all cases where a contributor or donor uses a foreign passport or passport number for identification purposes, provides a foreign address, makes a contribution or donation by means of a check or other written instrument drawn on a foreign bank or by wire transfer from a foreign bank, or resides abroad. A committee is deemed to have conducted a reasonable inquiry into the contributor or donor's nationality if you seek and obtain copies of current and valid U.S. passport papers for U.S. citizens. No person may rely on this safe harbor if he or she has actual knowledge that the source of the funds solicited, accepted, or received is a foreign national.

If you have received a contribution from a foreign national, you must refund the impermissible contribution to the donor in accordance with 11 CFR §103.3(b). Please inform the Commission of your corrective action promptly by providing the date of the refund. The committee should retain for its records copies of refund check(s). In addition, any refunds should be disclosed on Schedule B supporting Line 28 (a) of the report during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution(s), prompt action on your part to refund or provide clarifying information concerning these contributions will be taken into consideration.

6. Schedule A of your report discloses in-kind contributions to your committee. Please be advised that the value of in-kind contributions must be added to the receipts and disbursements total in order to avoid either inflating or deflating the cash on hand amount, and itemized on the appropriate Schedules A and B. (11 CFR § 104.13(a)) Please amend your report by itemizing the in-kind contributions on Schedule B.

7. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B, supporting Lines 21(b) and 29 of your report to clarify the following description(s): "* In-Kind;," "Consultant Services-General," and "Event Services." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published

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in the Federal Register can be found at

<https://www.fec.gov/help-candidates-and-committees/purposes-disbursement>

8. Please identify the name and address of the payee for the in-kind contributions disclosed on Schedule B, supporting Lines 23 and 29. (11 CFR §104.3 (b)(3))

9. Schedule B of your report discloses reimbursements to individuals for "Refund," "Reimbursement - Healthcare," and "Reimbursement." Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information and clearly identify on the Schedule B, which reimbursement each memo entry relates to. If itemization is not necessary, you must indicate so in an amendment to this report. 11 CFR §§104.3(b)(3)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3

- Your report discloses certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. For your information and consideration when preparing future filings, contributions to federal political committees should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page; contributions to federal candidates and other political committees should be properly disclosed on a separate Schedule B, supporting Line 23 of the Detailed Summary Page; and refunds to individuals/persons other than political committees should be properly disclosed on a separate Schedule B, supporting Line 28(a) of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (52 U.S.C. §30104(b) and FORM 3X Instructions)

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just

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those portions of the report that are being amended. For information about the report review process or specific filing information for your committee type, please visit www.fec.gov/help-candidates-and-committees. For more information about Requests for Additional Information (RFAI), why you received a letter, and how to respond, please visit www.fec.gov/help-candidates-and-committees/request-additional-information. Should you have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1157.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Chamorro', with a horizontal line extending to the left and a small flourish at the end.

Andrea Chamorro
Senior Campaign Finance Analyst
Reports Analysis Division

**Apparent Impermissible, Excessive, and Prohibited Contributions
Fair Fight (C00693515)**

Contributions from Possible Prohibited Entities (Corporations, Labor Organization, LLCs)

Contributor Name	Date	Amount	Report
Visionary Strategy And Insights Inc	12/30/19	\$350.00	2019 Year-End

Contributions from Possible Foreign Nationals

Contributor Name	Date	Amount	Report
Allen, James	12/19/19	\$100.00	2019 Year-End
Allen, James	12/29/19	\$1,000.00	2019 Year-End
Bercetche, Martin	9/17/19	\$500.00	2019 Year-End
Brust, Benjamin	9/23/19	\$100.00	2019 Year-End
Brust, Benjamin	12/24/19	\$500.00	2019 Year-End
Burns, Thaddeus	10/27/19	\$50.00	2019 Year-End
Burns, Thaddeus	11/6/19	\$50.00	2019 Year-End
Burns, Thaddeus	11/27/19	\$50.00	2019 Year-End
Burns, Thaddeus	12/6/19	\$50.00	2019 Year-End
Burns, Thaddeus	12/27/19	\$50.00	2019 Year-End
Clarke, Neil	12/13/19	\$2,000.00	2019 Year-End
Dodge, Kirstin	8/15/19	\$100.00	2019 Year-End
Dodge, Kirstin	11/7/19	\$100.00	2019 Year-End
Dodge, Kirstin	12/7/19	\$100.00	2019 Year-End
Isaacson, Lauren	11/14/19	\$250.00	2019 Year-End
Kuipers, Shelley	10/22/19	\$2,500.00	2019 Year-End
Larson, Micah	12/21/2019	\$500.00	2019 Year-End
Lolonis, Tanya	9/16/19	\$10.00	2019 Year-End
Lolonis, Tanya	9/20/19	\$500.00	2019 Year-End
Lolonis, Tanya	10/20/19	\$10.00	2019 Year-End
Lolonis, Tanya	11/16/19	\$10.00	2019 Year-End

**Apparent Impermissible, Excessive, and Prohibited Contributions
Fair Fight (C00693515)**

Lolonis, Tanya	12/8/19	\$250.00	2019 Year-End
Lolonis, Tanya	12/16/19	\$10.00	2019 Year-End
Preslar, Adam	12/19/19	\$250.00	2019 Year-End
Price, Neil	12/24/19	\$250.00	2019 Year-End
Roman, Michael	11/10/19	\$1,600.00	2019 Year-End
Sartor, Oliver	9/18/19	\$100.00	2019 Year-End
Sartor, Oliver	10/18/19	\$100.00	2019 Year-End
Sartor, Oliver	12/22/19	\$100.00	2019 Year-End
Shoemaker, Robert	12/10/19	\$1,500.00	2019 Year-End
Sinhababu, Neiladri	11/16/19	\$1,000.00	2019 Year-End
Spencer, Frederick	11/30/19	\$250.00	2019 Year-End
Stuart, Alexander	9/17/19	\$100.00	2019 Year-End
Stuart, Alexander	12/4/19	\$250.00	2019 Year-End
Tyrer, Stephanie	10/5/19	\$250.00	2019 Year-End
Weinstein, Elsa	9/10/19	\$100.00	2019 Year-End
Weinstein, Elsa	10/10/19	\$100.00	2019 Year-End
Weinstein, Elsa	11/10/19	\$100.00	2019 Year-End
Weinstein, Elsa	12/10/19	\$100.00	2019 Year-End